

Approved:

  
ANDREW JONES  
Assistant United States Attorney

Before:

THE HONORABLE ONA T. WANG  
United States Magistrate Judge  
Southern District of New York

**23 MAG 3272**

----- X  
UNITED STATES OF AMERICA

- v. -

JOSE SANTIAGO,  
a/k/a "Uncle,"  
ANGELO PALENCIA,  
a/k/a "Image," and  
ANTHONY BONILLA,  
a/k/a "Zay,"

Defendants.

**SEALED COMPLAINT**

Violation of 21 U.S.C. § 846

COUNTY OF OFFENSE:  
NEW YORK

-----  
SOUTHERN DISTRICT OF NEW YORK, ss.:

Michael Acanfora, being duly sworn, deposes and says that he is a Special Agent with the Drug Enforcement Administration ("DEA") and charges as follows:

**COUNT ONE**

(Narcotics Trafficking Conspiracy)

1. From at least in or about 2021, up to and including the present, in the Southern District of New York and elsewhere, JOSE SANTIAGO, a/k/a "Uncle," ANGELO PALENCIA, a/k/a "Image," and ANTHONY BONILLA, a/k/a "Zay," the defendants, and others known and unknown, intentionally and knowingly combined, conspired, confederated, and agreed together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that JOSE SANTIAGO, a/k/a "Uncle," ANGELO PALENCIA, a/k/a "Image," and ANTHONY BONILLA, a/k/a "Zay," the

defendants, and others known and unknown, would and did distribute and possess with intent to distribute controlled substances, in violation of Title 21, United States Code, Section 841(a)(1).

3. The controlled substance involved in the offense was 400 grams and more of mixtures and substances containing a detectable amount of fentanyl, in violation of Title 21, United States Code, Section 841(b)(1)(A).

(Title 21, United States Code, Section 846.)

The bases for my knowledge and for the foregoing charge are, in part, as follows:

4. I am a Special Agent with the DEA Long Island District Office, and I have been personally involved in this investigation. This affidavit is based on my investigation, my conversations with other law enforcement officers and other individuals, and my examination of reports and records. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

5. Based on my training and experience, my conversations with other law enforcement officers, and my review of publicly available information, I have learned the following, in substance and in part:

a. Since at least 2021, the DEA has seen a significant increase in the prevalence of counterfeit prescription pills laced with fentanyl, a lethal synthetic opioid that has led to a dramatic increase in overdose deaths.<sup>1</sup> In 2022 alone, the DEA seized more than 50 million fentanyl-laced counterfeit pills, a more than 500% increase from the previous year.<sup>2</sup> DEA laboratory testing of those pills has revealed a dramatic rise in the number of counterfeit pills containing at least two milligrams of fentanyl, which is considered sufficient for a potentially deadly dose.

---

<sup>1</sup> See <https://www.dea.gov/press-releases/2021/09/27/dea-issues-public-safety-alert> (last visited on May 31, 2022); see also “Overdose Deaths Continue Rising, With Fentanyl and Meth Key Culprits,” *New York Times*, May 11, 2022, <https://www.nytimes.com/2022/05/11/us/politics/overdose-deaths-fentanyl-meth.html> (last visited on May 31, 2022); “Fentanyl Tainted Pills Bought on Social Media Cause Youth Drug Deaths to Soar,” *New York Times*, May 19, 2022, <https://www.nytimes.com/2022/05/19/health/pills-fentanyl-social-media.html>.

<sup>2</sup> See <https://www.dea.gov/press-releases/2022/12/20/drug-enforcement-administration-announces-seizure-over-379-million-deadly> (last visited on April 21, 2023).

b. According to the National Institutes of Health (“NIH”), synthetic opioids (like fentanyl) are the primary driver of overdose deaths in the United States.<sup>3</sup> Between 2015 and 2022, annual overdose deaths involving opioids rose more than 240 percent (33,091 in 2015 to 80,411 in 2021), and overdose deaths involving synthetic opioids (primarily illicitly manufactured fentanyl) rose more than 735 percent (9,580 in 2015 to 70,601 in 2021).

c. Counterfeit pills, which frequently contain fentanyl, are often made to look almost identical to prescription opioid medications such as oxycodone.<sup>4</sup> For example, legitimate prescription oxycodone pills are often blue with an “M” on one side and the number “30” on the other side.

d. Counterfeit oxycodone pills laced with fentanyl are often referred to by a number of street names, including “Buttons,” “30s,” and “Blues.” Given the ease with which these counterfeit pills can be transported and concealed, they are widely accessible and often sold on the street and over the internet.

#### Overview of the Drug Trafficking Organization

6. Since at least July 2022, the DEA and Homeland Security Investigations (“HSI”) have been investigating a drug trafficking organization (“DTO”) that regularly ships multiple-kilogram quantities of fentanyl-laced, counterfeit oxycodone pills from the Los Angeles area to various locations in Florida and on Long Island for further distribution. During the investigation, agents have seized several of the DTO’s shipments filled with the fentanyl-laced, counterfeit oxycodone pills and identified many other shipments that the DTO has successfully made. Members of the DTO include JOSE SANTIAGO, a/k/a “Uncle,” ANGELO PALENCIA, a/k/a “Image,” and ANTHONY BONILLA, a/k/a “Zay,” the defendants.

#### The July 2022 Seized Packages

7. Based on my participation in the investigation, including conversations with other law enforcement agents, my review of law enforcement reports and records, business records, and an iCloud account, searched pursuant to a judicially authorized warrant, I am aware of the following:

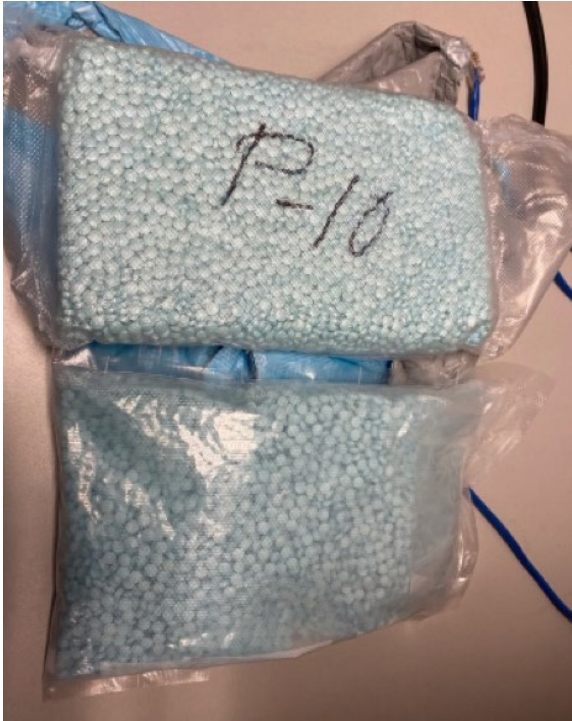
a. On or about July 12 and 13, 2022, employees of the United Parcel Service (“UPS”) turned over to law enforcement agents at JFK International Airport two packages (“Package-1,” “Package-2,” and together, the “July 2022 Seized Packages”) that UPS employees had identified as suspicious and opened and searched pursuant to company policies. Inside of each of the July 2022 Seized Packages were thousands of light blue pills that were imprinted with the markings “M” on one side and “30” on the other.

---

<sup>3</sup> See <https://nida.nih.gov/research-topics/trends-statistics/overdose-death-rates> (last visited on April 21, 2023).

<sup>4</sup> See <https://www.dea.gov/onepill> (last visited on April 21, 2023).

b. The combined weight of the pills in the July 2022 Seized Packages was approximately 3.4 kilograms. The pills from the July 2022 Seized Packages were submitted to a DEA laboratory for testing, which confirmed the July 2022 Seized Packages contained approximately 30,000 pills, and that the pills contained fentanyl. Photographs of the pills seized in Packages-1 and -2 are below.



*Package-1*



*Package-2*

c. Shipping records from UPS show that that Package-1 and Package-2 were each shipped on July 9, 2022, from Los Angeles to Huntington Station, New York and that both packages listed the same shipper and recipient information.

i. Each package listed the shipper as “Exotic Snacks and Custom Designs,” with the same address in Los Angeles and the same contact phone number (the “Exotic Snacks Phone”).

ii. Each of the July 2022 Seized Packages were addressed to the same recipient (“Individual-1”) at the same address in Huntington Station, New York (the “Huntington Station Address”), and each of the July 2022 Seized Packages listed the same recipient’s phone number (“Santiago Phone-1”).

iii. The July 2022 Seized Packages were shipped for next-day delivery and were flown on UPS flights from Los Angeles International Airport to Louisville International Airport and then from Louisville International Airport to John F. Kennedy International Airport in Queens. Package-1 arrived at JFK Airport on July 12, 2022, and Package-2 was delayed and arrived on July 13, 2022.

d. Subscriber information from AT&T Wireless for Santiago Phone-1 listed the user of Santiago Phone-1 as “Josesantiagos Wifey” and the financially liable party for the phone as “Jose A Santiago.” Subscriber information for a second phone number on the same account (“Santiago Phone-2”) listed the user of Santiago Phone-2 as “Joseph A Rizzo” and the financial responsible party as “Jose A Santiago.” Both Santiago Phones-1 and -2 had the same billing address in Kissimmee, Florida, and both phones had the same account email address, which included “josesantiago” as part of the email address (the “Santiago Email Address”).

e. Airline records showed that JOSE SANTIAGO, a/k/a “Uncle,” the defendant, flew from Orlando to Los Angeles on July 8, 2022, the day before the July 2022 Seized Packages were shipped from Los Angeles to New York, and that SANTIAGO returned from Los Angeles to Orlando on July 10, 2022, the day after the Seized Packages were shipped from Los Angeles to New York. SANTIAGO used Santiago Phone-2 for both flight reservations.

f. Additional airline records showed that in or about April 2022, SANTIAGO had used the Exotic Snacks Phone as the contact number for a flight reservation from Los Angeles to New York.

g. On or about July 22, 2022, the Honorable Ona T. Wang, United States Magistrate Judge for the Southern District of New York, authorized a warrant for historic and prospective cellphone location information for the Exotic Snacks Phone and Santiago Phones-1 and -2 (collectively the “Santiago Phones”). The location information from the Santiago Phones showed that on or about July 28, 2022, when location information for the phones was first received, that the Santiago Phones were in Los Angeles and were likely located together. Airline records show that SANTIAGO was in Los Angeles at the same time and that on or about July 29-30, 2022, SANTIAGO flew from Los Angeles to Orlando. Location information for the Santiago Phones showed that the phones were turned off in Los Angeles and turned back on in the Orlando area at approximately the same time that SANTIAGO flew from Los Angeles to Orlando. Additional cellphone location data showed that the Santiago Phones were usually in the same approximate location as each other.

h. Following the seizure of the July 2022 Seized Packages, the boxes and their non-drug contents were submitted to the HSI Forensic Laboratory for fingerprint analysis. The senior fingerprint specialist conducting the analysis concluded that fingerprints matching those known to belong to ANGELO PALENCIA, the defendant, were found on the boxes for each of the July 2022 Seized Packages and on bubble wrap inside of each of the boxes.

i. Airline records showed that PALENCIA flew from New York to Los Angeles on July 8, 2022, the day before the July 2022 Seized Packages were shipped from Los Angeles to New York, and that PALENCIA returned from Los Angeles to New York on July 10, 2022, the day after the Seized Packages were shipped from Los Angeles to New York. These travel dates were the same as those taken by SANTIAGO for his trip from Florida to Los Angeles.

j. On or about October 27, 2022, the Honorable Robert W. Lehrburger, United States Magistrate Judge for the Southern District of New York, authorized a warrant to seize and search an iCloud account associated with the Santiago Email Address (the “Santiago iCloud Account”). According to records provided by Apple, the account holder for the Santiago



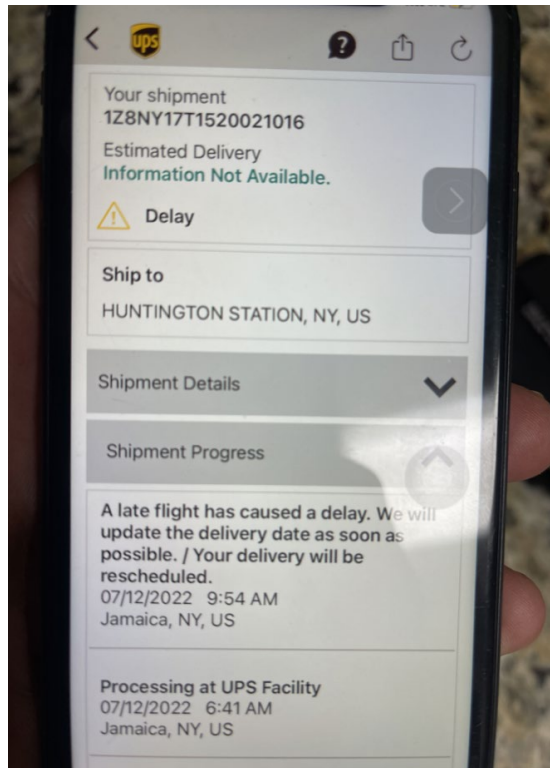
iCloud Account is “Jose Santiago” and a verified phone number for the account is Santiago Phone-2. The contents of the Santiago iCloud Account included numerous emails addressed to “Jose Santiago” and numerous photographs of SANTIAGO, whom I recognize based on known photographs of SANTIAGO in law enforcement data bases and personal observation of SANTIAGO. Also included among the contents of the Santiago iCloud Account were photographs of the shipping labels of Packages-1 and -2, and a photograph of delivery tracking information for Package-1. Copies of those photographs are below.



*Package-1*



*Package-2*



*Package-1 Tracking Information*

The January 2023 Seized Package

8. Based on my participation in the investigation, including conversations with other law enforcement agents, my review of law enforcement reports and records, business records, and an iCloud account, searched pursuant to a judicially authorized warrant, I am aware of the following:

a. On or about January 11, 2023, law enforcement agents based in Louisville, Kentucky identified a package being shipped by UPS from Los Angeles to Brentwood, New York (Package-3) as likely containing narcotics. A warrant was obtained to search Package-3, and the search revealed Package-3 contained thousands of light blue pills that were imprinted with the markings “M” on one side and “30” on the other.

b. The total weight of the pills in Package-3 was approximately 2.9 kilograms. The pills from Package-3 were submitted to a DEA laboratory for testing, which confirmed Package-3 contained approximately 26,000 pills, and that the pills contained fentanyl. A photograph of the pills seized from inside Package-3 is below.



c. Shipping records from UPS state that Package-3 was shipped from Los Angeles to Brentwood, New York on or about January 10, 2023. The listed shipper for Package-3 was “Jeff” with a shipping address in Los Angeles and a contact phone number ending in -6026 (the “Jeff Phone”). The listed recipient for Package-3 was “Alexes” at an address in Brentwood, New York.

d. Phone records for the Jeff Phone did not list a subscriber but stated the phone became active on or about November 17, 2022. According to toll records for the Jeff Phone, between December 31, 2022 and January 9, 2023, the Jeff Phone had 46 contacts with a phone number that according to records from T-Mobile is subscribed to by Individual-1 (with a one-letter difference in the spelling of the first name of Individual-1), the intended recipient of the July 2022 Seized Packages, and has an account address as the Huntington Station Address, the shipping address for the July 2022 Seized Packages. The toll records also showed that the Jeff Phone had seven common contacts with Santiago Phone-2 and four common contacts with Santiago Phone-1.

e. Airline records showed that JOSE SANTIAGO, a/k/a “Uncle,” the defendant, flew from Orlando to Long Beach, California on January 5, 2023, a few days before Package-3 was shipped from Los Angeles to New York, and that SANTIAGO returned from Long Beach to Orlando on January 11, 2023, the day after Package-3 was shipped from Los Angeles to New York.

f. Following the seizure of Package-3, the box and its non-drug contents was submitted to the HSI Forensic Laboratory for fingerprint analysis. The senior fingerprint specialist conducting the analysis concluded that fingerprints matching those known to belong to ANTHONY BONILLA, a/k/a “Zay,” the defendant, were found on the box that was Package-3 and on the contents of Package-3.



Additional DTO Shipments

9. From reviewing UPS shipping records, I believe that the DTO engaged in additional shipments of narcotics from Los Angeles to New York and Florida.

a. As described above, the July 2022 Seized Packages were shipped to Individual-1 at the Huntington Station Address. The sender was “Exotic Snacks” that used the Exotic Snacks Phone as a contact number. Between March and June 2022, at least an additional nine UPS shipments were sent from Los Angeles to Individual-1 (or a name that appears to be a misspelling of Individual-1’s name) at the Hunting Station Address. Three of those shipments were sent by “Exotic Snacks” and those three all used the Exotic Snacks Phone as a sender contact number. Five of the remaining six shipments to Individual-1 were sent by the same purported sender (“Individual-2”). Four of the five shipments from Individual-2 to Individual-1 used the Exotic Snacks Phone as the sender’s contact number. The remaining shipment from Los Angeles to Individual-1 was not sent by Exotic Snacks nor Individaul-2, but the shipment description provided to UPS for the remaining shipment was “Exotics Snacks.”

b. According to UPS records, in addition to sending shipments to Individual-1, in June and July 2022, “Exotic Snacks” sent at least three additional packages from Los Angeles to Long Island to other recipients. One of those packages was shipped on July 9, 2022, the same date as Packages-1 and -2, and was mailed to an address in Lake Grove, New York (the “Lake Grove Address”). According to records maintained by the Suffolk County Probation Office, the Lake Grove Address is the home address of ANGELO PALENCIA, a/k/a “Image,” the defendant. During the investigation of the DTO, on multiple occasions, agents observed PALENCIA at and around the Lake Grove Address.

c. According to UPS records, in June 2022, “Exotic Snacks” sent at least three packages to central Florida. Two of those packages were sent on June 4 and June 13, 2022 and were mailed to “Jay Santos” at an address on English Drive in Deltona, Florida (the “English Drive Address”). From reviewing records from local law enforcement agencies and from being present for the execution of the arrest and search, I am aware that SANTIAGO resides at the English Drive Address and that on or about February 24, 2023, JOSE SANTIAGO, a/k/a “Uncle,” the defendant, was arrested at the English Drive Address and the location was searched pursuant to a warrant, based on probable cause to believe that SANTIAGO had engaged in vehicle theft and fraud, in violation of Florida law. During a search of the English Drive Address, among other things, local law enforcement agents recovered approximately 37 grams of powdered fentanyl and approximately 8 grams of light blue pills that were consistent in appearance with those seized in Packages-1, -2, and -3.

d. According to records from UPS, in March and April 2022, Individual-2 sent an additional four shipments from Los Angeles to Long Island, in addition to the five that Individual-2 sent to Individual-1.

e. According to records from UPS, on or about December 22, 2022, a package with the same sender and recipient as would later be used for Package-3 was sent from Los Angeles to Brentwood, New York.

10. As described above, the Santiago iCloud Account, an account that belongs to JOSE SANTIAGO, a/k/a “Uncle,” the defendant, was searched pursuant to a warrant. The contents of the Santiago iCloud Account provide additional evidence of the DTO’s narcotics trafficking. For example:

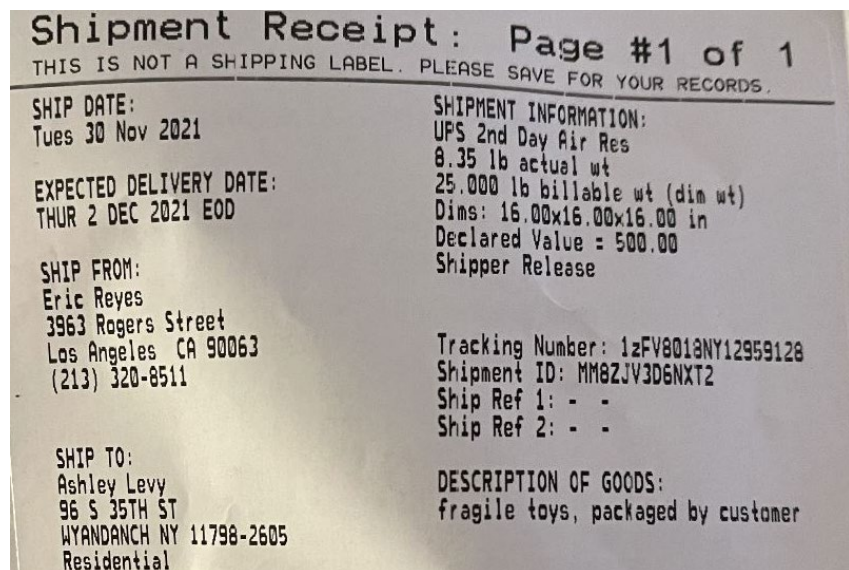
a. The photographs below were saved to the Santiago iCloud Account. The photograph on the left shows pills consistent in appearance with those seized from Packages-1, -2, and -3. The photograph on the right depicts additional pills, whose markings I recognize as similar to generic Xanax. Metadata for both photographs reveal the photographs were taken on or about October 24, 2021 at an address on Wedgewood Drive in Coram, New York (the Wedgewood Drive Address”). From reviewing law enforcement surveillance reports, I am aware that on or about August 14, 2022 and September 20, 2022, law enforcement agents observed SANTIAGO at the Wedgewood Drive Address.



b. The photograph below was saved to the Santiago iCloud Account. The photograph shows pills consistent in appearance those seized from Packages-1, -2, and -3. Metadata for the photograph indicates that the photograph was taken on or about September 8, 2021. The metadata does not indicate where the photograph was taken.



c. As described above, the Santiago iCloud Account contained photographs of shipping labels and UPS tracking information for Packages-1 and -2. The account also contained numerous other photographs of shipping labels and receipts for shipments of packages from Los Angeles to New York, including ones dating back to 2021. Two such examples are shown below.



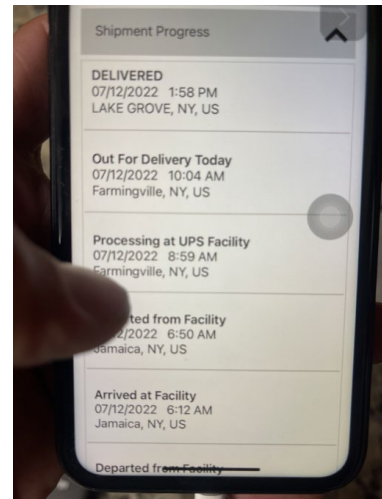
d. The photograph below was recovered from the Santiago iCloud Account and depicts an additional shipping receipt and tracking number. The metadata for this



photograph indicates that it was taken on or about July 30, 2022 at the English Drive Address, which as previously described, is SANTIAGO's residence.



e. The photographs below were recovered from the Santiago iCloud Account. The photograph on the left depicts a UPS package that was mailed from Los Angeles to New York on or about July 9, 2022. This is a photograph of an additional package sent on the same date that Packages-1 and -2 were sent. The photograph on the right depicts tracking information for the same package.



11. From reviewing airline records and UPS shipping records, I am aware of the following:

a. On or about March 21, 2022, JOSE SANTIAGO, a/k/a “Uncle,” and ANTHONY BONILLA, a/k/a “Zay,” the defendants, flew on the same reservation from JFK International Airport to Los Angeles International Airport. SANTIAGO and BONILLA returned from Los Angeles to New York on the same reservation on or about March 26, 2022. On or about March 24, 2022, two packages shipped in the name of Individual-2 were shipped by UPS from Los Angeles to New York. On or about March 25, 2022, an additional package was shipped in the name of Individual-2 from Los Angeles to Individual-1 in New York.

b. On or about March 31, 2022, SANTIAGO, BONILLA, and ANGELO PALENCIA, a/k/a “Image,” the defendant, flew on the same reservation from JFK International Airport to Los Angeles International Airport. SANTIAGO, PALENCIA, and BONILLA returned from Los Angeles to New York on the same reservation on or about April 3, 2023. On or about April 2, 2022, a package shipped in the name of Individual-2 was shipped by UPS from Los Angeles to New York. On or about April 4, 2022, five packages were shipped in the name of Individual-2 from Los Angeles to New York. Three of those packages were sent to Individual-1.

WHEREFORE, I respectfully request that JOSE SANTIAGO, a/k/a “Uncle,” ANGELO PALENCIA, a/k/a “Image,” and ANTHONY BONILLA, a/k/a “Zay,” the defendants, be arrested and imprisoned or bailed, as the case may be.

S/ Michael Acanfora /otw

Michael Acanfora  
Special Agent  
U.S. Drug Enforcement Administration

Sworn to me by reliable electronic means  
on April 25, 2023



THE HONORABLE ONA T. WANG  
UNITED STATES MAGISTRATE JUDGE  
SOUTHERN DISTRICT OF NEW YORK